

## BLM\_NV\_NVSO\_GWProjects

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**From:** Sara Clark <saraann200@gmail.com>  
**Sent:** Monday, October 01, 2012 11:21 AM  
**To:** BLM\_NV\_NVSO\_GWProjects  
**Subject:** The Clark, Lincoln, and White Pine Counties Groundwater Development Project FEIS - Environmental Justice and Tribal Concerns

Dear Ms. Woods,

The SNWA's proposed groundwater development project intends to siphon billions of gallons of groundwater per year from at least four valleys in central Nevada and pump it 300 miles away to the Las Vegas valley. This project poses a grave threat to the water and cultural resources of all Tribes and Indian people in the State of Nevada.

SNWA's groundwater development project has been described as one of the biggest threats to traditional ways of life since colonization. The Bureau of Land Management (BLM) will not be able to adequately protect millions of acres of public and Tribal lands from massive water depletion, land subsidence, and harmful impacts to cultural resources. This project will result in significant, adverse impacts to the Tribes' ability to engage in traditional practices of hunting, gathering and fishing on ancestral lands. Moreover, the BLM has failed to honor its obligation to conduct meaningful consultation with Indian tribes on a government-to-government basis, and to protect Tribal resources, as required by law. This failure, while devastating, is hardly surprising - BLM is systematically failing to meet its legal obligations to Tribes across the American southwest.

SNWA's project is an unsustainable groundwater mining project that places the present and future generations of all Tribes in the State of Nevada in jeopardy, as well as the natural environment. I urge you to (1) suspend this environmental review process until SNWA's water rights applications conclude; (2) engage in formal Tribal consultation with all Nevada tribes on a government-to-government basis regarding cultural and water resources, including federally reserved water rights; (3) revise the Programmatic Agreement to ensure that Tribal cultural resources, including human remains and sacred sites, are adequately protected in accordance with both the letter and spirit of federal and Tribal laws; and (4) reinstate this environmental review process only once final information is available regarding the amounts of water SNWA will be authorized to pump, including more accurate locations of wells and associated infrastructure. Should BLM refuse to take these requested actions, it is my opinion that BLM has failed to take the 'hard look' required by the National Environmental Policy Act.

Sincerely,  
Sara Clark

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Sara A. Clark  
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